

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

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MRP PROPERTIES COMPANY, LLC,  
VALERO REFINING COMPANY –  
OKLAHOMA, VALERO REFINING  
COMPANY – TENNESSEE, L.L.C.,  
THE PREMCOR REFINING GROUP INC.,  
VALERO REFINING – TEXAS, L.P.,  
and ULTRAMAR INC.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

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No. 1:17-cv-11174-TLL-PTM

**AFFIDAVIT OF TIM GEORGE**

Tim George, being duly sworn, deposes and says:

1. I, Tim George, am over eighteen (18) years of age and I reside in San Antonio, Texas. I have personal knowledge of the facts set forth in this affidavit and I am competent to testify to them if necessary.

2. I am an employee of Valero Services, Inc., holding the title of Vice President, Environmental Liability. In this role, it is my responsibility to manage environmental liabilities arising from soil or groundwater contamination for the wholly-owned corporate subsidiaries of Valero Energy Corporation. Since 1988, I

have provided these services for certain of these subsidiaries and their predecessor companies, including Plaintiffs in this case.

3. I have knowledge of the extent and nature of contamination at, and key remediation decisions related to, the refinery sites included in the First Amended Complaint in the above-captioned lawsuit (the “sites”). It is anticipated that I would be acting as a fact witness or corporate representative for all the sites, and therefore must be prepared to testify regarding each individual location. Thus, if I had to testify about the sites in separate court cases I would expect to have to testify about all of the sites in each case, repeat much of my testimony in each case, and be prepared to discuss in each case what I testified in the other cases. It would be far more efficient, practical, and convenient for me to testify in one court case, and it would be inefficient, costly, and unduly burdensome for me to prepare for and appear in multiple court cases.

4. In order to provide complete and correct testimony, I will rely on documents that are kept in a central file system in San Antonio, where my office is located. These documents are either already in electronic form, or they can be converted to electronic form, for purposes of this litigation.

5. The soil and groundwater remediation at the sites follows a somewhat consistent process of investigation, interim measures, and remediation. Therefore, I anticipate that my testimony regarding process, and applicable corporate policies

and procedures will be repetitive if I were required to testify in several different venues.

6. I believe that travel to nine different districts for nine separate trials would be inefficient and an unnecessary burden on myself and the court system. It would be significantly more convenient for me to appear in one district for one trial, given that I would need to travel from San Antonio to each of the trials.

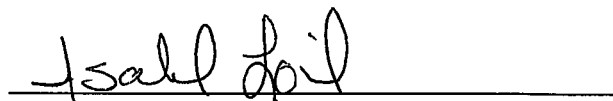
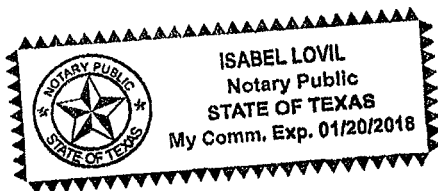
I declare under penalty of perjury that the foregoing is true and correct.



Tim George

STATE OF TEXAS           §  
                                     §  
COUNTY OF BEXAR       §

SUBSCRIBED AND SWORN TO BEFORE ME this 22<sup>nd</sup> day of  
September, 2017.



Notary Public in for  
The State of Texas